

## COMPLIANCE SAUPLING INSPECTION

TY INOTS BIRMINGHAM & BOLT (KANKAKEE COUNTY)

Industrial Wastewater
Treatment - IL0035297

INSPECTION DATE:

June 13, 1985

INTERVIEWED:

Gene Satori, Mill Manager Edward Maynard, Safety Supervisor

On the above date a Compliance Sampling Inspection was conducted at the subject facility. Form 3560-3 (CSI) is attached for reference.

## Facility Description

This facility manufactures bolt and finished steel (rods) from scrap metal. The plant is located on McKnight Road, west of Route 50, just north of the town of Bourbonnais. The two NPDES discharges are as follows:

- OC1 Consists of stormwater runoff from the warehouse and manufacturing area. Treatment consists of an oil-water separator. The effluent is discharged to a ditch that is tributary to Soldler Creek. At the time of inspection the separator itself was full of oily matter and surrounded by bushes at least seven feet high.
- OO2 The waste stream consists of recirculating cooling water for the rolling mill. The cooling water enters a three-stage pend that has the ability to discharge at high levels. The pends were extremely ofly, and obviously at very high temperatures at the time of visit. A sprayer was installed to keep the temperature down. The pend was discharging at the time of visit. Signs of heavy oil were visible on the stained rocks at the outfall. The receiving stream is also a tributary to Soldier Creek.

The plant has been under new management since January of 1984, which is the issuance date of Illinois Birmingham and Bolts new permit. Gene Satori, the present mill manager stated he was unaware of the requirements of his NPDES permit. When he "reviewed" it he "just noted the expiration date then filed it."

## 08M Items

During the inspection these deficiences were noted:

1. Operator's Certification - Presently this facility is without a certified operator (Class K), which is needed for an industrial treatment facility. Recently the mill manager hired Ed Maynard as safety supervisor. Maynard's duties would include all



Environmental permits. He also stated that he recently enlisted the services of Water Environmental Tech, Inc. of Peru, Illinois, as a consultant. According to Maynard, they were one of the companies referred to him by Gary Reside of the IEPA Compliance Assurance Section in Springfield.

During the inspection, Maynard expressed confusion at the fact that two discharges were listed in the NPDES permit. He was under the impression that 002 (the pends) were 001, and had no notion what 002 was. I informed him that 001 was a separate discharge and showed him the oil separator. He said he had no idea that this facility existed and neither did the consultant.

2. Records and Reports - There are no operating logs or records for any of the discharges or their treatment facilities, no records of when the sprayers were installed, no records of when oil has been removed from the ponds. Additionally, no written records of monitoring or sampling of any kind were available.

## NPDES Violations

Moritoring and Reporting - No Discharge Monitoring Reports have been submitted regularly from Illinois Birmingham & Bolt since 1977, when the company went under the name of Jones and McKnight. At the time, Jesse Prittchert was the certified Class K operator. As a result of a pre-enforcement conference on May 2, 1982, attended by Ernest J. Mooney, the plant manager at the time, Illinois Birmingham & Bolt agreed to start monitoring for its NPDES parameters. According to a follow-up letter the company contacted Industrial Analytical Labs in Bourbonnais to perform all testing and fill out reports. One DMR was submitted, unsigned, in November of 1982, under the name of "Principal Executive Officer," - the name typed was Paul W. Wiedenbach, a former employee of Industrial Analytical Labs. The report showed violations in Total Suspended Solids, Oils and Grease and Fecal Coliform, which at the time was a parameter on their expired permit. The TSS for one unspecified discharge showed a concentration of 122 mg/l and FOG of 62.8 mg/l. No further testing is on record at the Industrial Analytical Lab from that period and no further DMRs have been submitted to this Agency.

According to the present mill manager, before Illinois Birmingham & Bolt received a Compliance Inquiry Letter from IEPA dated in February, 1985, addressing non-submittal of DMRs, he was totally unaware of this requirement. Edward Maynard stated that he did take a sample to Industrial Analytical Labs but wasn't sure of the date or what he tested for Sandy Benjamin of Industrial Analytical Labs, informed this writer that her lab has performed

one test according to the NPDES and has sent Illinois Birmingham & Bolt a price quote for further testing.

Flow Measurement - Illinois Birmingham & Bolts present permit asks for flow to be measured when monitoring. On the aforementioned last DMR submitted to this Agency, the flow for both 001 and 002 was listed as N.A. During the inspection it was noted there was no way under present conditions flow can be accurately measured from each discharge.

The outfall pipe from the OO1 oil separator at the time of visit was at the same water level as the receiving ditch making the determination of flow impossible. Oil separators of this type usually have an overflow weir (most frequently a V-notch type) in order for the flow to be measured at least by the bucket-times method. Although the OO2 outfall appeared to be above the water level of the receiving ditch, it was partially covered by rocks (see photo) making any kind of flow measurement impossible.

Effluent - On the present permit, the concentration limits for TSS and FOG, for both 001 and 002, are an average of 15 mg/l and a maximum of 30 mg/l. However, the permit calls for a sampling frequency of a grab sample once a month, making the average and maximum one and the same.

At the time of inspection a grab sample was taken near the overflow pipe at the 001 oil separator. As mentioned earlier, the flow was undeterminable. The lab results showed a TSS of 130 mg/l.

A sample was also taken at the outfall of discharge 002. The lab results showed a FOG concentration of 16 mg/l and a TSS concentration of 160 mg/l. The temperature of the effluent was 95° F, which is just at the temperature limit for June, under Special Condition 5 under the present permit.

<u>Summary</u> - Attached to this inspection are photos taken on May 30, 1985 during a reconnaissance inspection. It is recommended that the O&M deficiencies and NPDES violations be addressed by Region 2.

Chris Kallis, E.P.S.

CK:bh

6/26/85

NPDES COMPLIANCE INSPECTION REPORT (Coding Instructions on back of last p	page)	
TRANSACTION INSPECT FACTOR OF TYPE TOR TYPE	TIME	
ि विकार विका	a.m. p.m.	
REMARKS	14.11.	
ADDITIONAL	6≟	
65 70		
SECTION A - Permit Summary		
	EXPIRATION DATE	
	DCC-1-88	
I MCRAIGHT ROAD	Jan - 9 - 84	
	PHONE	
ł	815-437-3127	
FACILITY REPRESENTATIVE TITLE	PHONE	
Ed maynard sarety supervisor	//	
FACILITY REPRESENTATIVE  FACILITY REPRESENTATIVE  TITLE  SECTION B - Effluent Characteristics (Additional sheets attached ) no data ave	i i is let c	
IPARAMETER/ E- A - 1% - 1874	1 1 61 /1 1 6	
OUTFALL MINIMUM AVERAGE MAXIMUM ADDIT	ONAL	
SAMPLE MEASUREMENT		
PERMIT REQUIREMENT		
SAMPLE MEASUREMENT		
PERMIT REQUIREMENT		
SAMPLE MEASUREMENT		
PERMIT REQUIREMENT		
SAMPLE MEASUREMENT		
PERMIT REQUIREMENT		
SAMPLE MEASUREMENT		
PERMIT REQUIREMENT		
SECTIC $\forall$ C - Facility Evaluation (S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)		
LEFTLUENT WITHIN PERMIT REQUIREMENTS (A OPERATION AND MAINTENANCE		
RECORDS AND REPORTS  A COMPLIANCE SCHEDULE  LABORATOR  PERMIT VERIFICATION  A FLOW MEASUREMENTS  OTHER:	Y PRACTICES	
SECTION D - Comments	······································	
SECTION E - Inspection/Review	ENFORCEMENT	
SIGNATURES AGENCY DATE	DIVISION .	
INSFECTED BY	USE ONLY COMPLIANCE STATUS	
LCAN, Kalus 11EPA 11-1-8)		
INSPECTED BY	Пормицанов	
	DNONCOMPLIANCE	
REVIEWED BY /C/A 7/1/FS		

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable	PERMI		) ( )					
	<u> </u>	0035	211					
SECTION F - Facility and Permit Background  ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY  DATE OF LAST PREVIOUS INV	VECTION TIO	V BV FB ( /CT						
(Fielisling City, County and ZIP code)	STIGATION	A B F E FAGS L	A E					
cellinois Birmingham + Bolt FINDINGS								
po Box 628								
Kunicakee allibois								
SECT ON G - Records and Reports								
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.   BYES Z'NO DN/A (FILE)	ırther explana	tion attached						
DETAILS:								
(a) ADEQUATE RECORDS MAINTAINED OF:		·····						
III S AMPLING DATE, TIME, EXACT LOCATION	☐ YES	☑ NO	□ N/A					
(ii) ANALYSES DATES, TIMES	☐ YES	No	<u></u>					
(iii) INDIVIDUAL PERFORMING ANALYSIS	U YES	DY NO	_  <u></u> N/ <u>A</u>					
(iv) ANALYTICAL METHODS/TECHNIQUES USED	YES YES	ET NO	□ N/A □ N/A					
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)  (c) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS	- ·	LLAF IVO	- LIN/A					
INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g. continuous monitoring instrumentation								
celibration and maintenance records).	YES	NO .	□ N/A					
((c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☐ YES	□ NO	Ø N/A					
: ((c) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNI	T, 🗆 YES	Ū NO	□ N/A					
(c) QUALITY ASSURANCE RECORDS KEPT.	YES	I NO	□ N/A					
(1) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING								
PUBLICLY OWNED TREATMENT WORKS.	☐ YES	□ №	☑ N/A					
SECTION A - Permit Verification			1					
INSPECTION OBSERVATIONS VERIFY THE PERMIT. WYES DNO DN/A (Further explanation	n attached							
DEVAILS:								
(a) CORRECT HAME AND MAILING ADDRESS OF PERMITTEE.	☐ YES	Ū NO	□ N/A					
(b) FACILITY IS AS DESCRIBED IN PERMIT.	[d YES	□ NO	□ N/A					
(c) PRINC FAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMI			-					
APPLICATION.	☑ YES	□ NO	L N/A					
(a) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☐ YES	O NO	L N/A					
((e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	YES	□,NO	E N/A					
(f) ACCULATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☐ YES  ☑ YES	ON 🖫	L N/A					
(b) CORRECT NAME AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT. (b) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	E YES	□ NO	E N/A					
(i) ALL DISCHARGES ARE PERMITTED.	T YES	ON D	E N/A					
SECTION 1 - Operation and Maintenance								
	than aunlau	ation attached						
DETAILS:	игтег ехрини	mon enacheu	/					
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	☐ YES	Пио	₩/A					
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ YES	□ NO	EZ N/A					
(3) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPASTATE AS REQUIRED BY PERMIT.	☐ YES	ON []	E'N/A					
(4) SLUDGES AND GOL: DS ADEQUATELY DISPOSED.	? 🗆 YES	□ NO	□ N/A					
(a) ALL TREATMENT UNITS IN SERVICE.	☑ YES	□ NO	□ n/a					
(1) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND								
MAINTENANCE PROBLEMS.	Z YES	□ NO	<u> </u>					
(g) QUALIFIED OPERATING STAFF PROVIDED.	YES	Z NO	_ DN/A					
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	YES	Q NO	_ <u> </u>					
() FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☐ YES	Ø NO	E N/A					
() INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☐ YES	d NO	E:N/A					
(R) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	☐ YES	☑ NO	□ N/A					
(i) SECC PLAN AVAILABLE.	☐ YES	₩ NO	E N/A					
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING, (Dates)	□ IYES	□ NO	E'N/A					
(n) ANY BY-PASSING SINCE LAST INSPECTION.	□,YES	Оио	ĽN/A					
(a) ANY HYDHAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	1 YES	□ NO	□ N/A					

	2.4	ERMIT	vo. ∂ 3 3 3.	37
SECTION J - Compliance Schedules		** * * *	. <u>V</u>	J., L.
PERMITTEE IS MEETING COMPLIANCE SCHEDULE. DYES DNO DN/A (Futher ex	olani	rion atta	rehed	!
CHECK APPROPRIATE PHASE(S):				
() (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.				
$\square$ (5) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.	).			
$\square$ in contracts for engineering services have been executed.				
$\square$ (a) design plans and specifications have been completed.				
☐ (→ CONSTRUCTION HAS COMMENCED.				
(f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.				
[] (g) CONSTRUCTION HAS BEEN COMPLETED.				
[] (IN START-UP HAS COMMENCED,				
$\square$ ( ) the permittee has requested an extension of time.				!
SECTION K - Self-Monitoring Program				
Part 1 - Flow measurement (Further explanation attached)				
PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT.  DETAILS:		YES		Elnia
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.		YES	GKNO	Eln/A
TYPE OF DEVICE:     DWEIR     DARSHALL FLUME   LANDOMFTER   DVENTURI METER   C	CT	HER (Spe	<u> </u>	
Ф, CALIBBATION FREQUENCY ADROUATE. (Date of last calibration		YES		EPKN/4
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.		YES	E, NO	Elviva
G. SECO SEARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED.		YES	W/ NO	EIN/A
(a) FLOW MEASUREMENT EQUITMENT ADEQUATE TO HANDLE EXPECTED TANGES OF FLOW RATED.		YES	<u>I no</u>	- FINITA
Part 2 — Sampling (Further explanation attached)			,	
RETMITTES SAMPLING DISCTS THE REQUIRITMENTS AND INTENTICE THE PERMIT.		YES	<b>☑</b> 6 0	Elviss
DETAILS:				
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.		YES	E 10	EIN/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.		YES	<b>⊡</b> ∨0	Elnza
(6) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT.  IF NO. DGRAB DMANUAL COMPOSITE DAUTOMATIC COMPOSITE FREQUENCY		YES	□/NO	Elina
(d) SAMPLE COLLECTION PHOCEDURES ARE ADEQUATE.		YES	<u> </u>	6. NVA
(i) SAMPLES REFRIGERATED DURING COMPOSITING		YES	<u> </u>	<u> </u>
(ii) PROPER PRESERVATION TECHNIQUES USED		YES		<u> </u>
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT		YES	<u> </u>	<u> Mn/a</u>
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3  (v) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY		YES	<u> </u>	M/A
PERMIT.		YES	□ NO	BI NZA
(f) IF (a) S MES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.		YES	□ No	ERNA
Part 3 – Laboratory (Further explanation attached)				
PREMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT.	П	YES	E NO	[] N/A
DETAILS:	٦	163		C.7147,24
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED, (40 CFR 136.3)	П	YES		E]N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED			C 10	EIN/A
		YES	E NO	EINA
(d) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED. (d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.		YES		El N/A
(e) QUALITY CONTROL PROCEDURES USED.		YES	<u> </u>	EIN/A
(f) DUI-LICATE SAMPLES ARE ANALYZED % OF TIME.		YES	E' NO	Eln/a
(g) SPIKED SAMPLES ARE USED % OF TIME.		YES	GZNO	EIN/a
IM COMMERCIAL LABORATORY USED. A SEC DANTATIVE		YES	W,50	E] N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.		YES	☑ vo	Eln/a
LAPNOME				
LAB NAME		<del> </del>		
LAB ADDRESS	إ	··		

Form Approved
OMP No. 153 - K007

/						PERMIT	MP No. 153-1600 O. 733297
SECTION L - Effi	uent/Receiving Wa	ter Observations ( $F$	urther explanation a	ntached)		<u>- 1</u>	
OUTFALL NO.	OIL SHEEN	GREASE	TURBICITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001			high		y 65	grey	
19.0 2	Slight	10 0 h C	h rgh-	none	YUS		
			N: Complete as app				
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AMPLE REPRES	SERATED DURIN	G COMPOSITING:	TURE OF DISCHAF	ОИС			
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			5 0 F				

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SAMPLE TYPE CODE	18	SAMPLE TYPE COCE	18	SAMPLE TYPE CODE	
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0 6	BARIDIA	<u> </u>	FLUORIDE	19 -	2:
21-02 MONTH OF	(BONOH)	8.3	CHLORIDE	24 -	2 0
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25-26 -La- HOUR (NEAREST)	CHNOMIUM (F	3, 0,00	YOTAL BULFUF		
TIME OF DAY IA, P, H, I	CHMONUM LT		(oil)	3)	31°
WATER TEMPERATURE	CHROMIUMITO	30 - 38	M. B. A. S.	33 -	
31-13 FIELD D.Q.	(COPPER)	003	CARBON CHEO	ROPORM	1
(m. (main) _ 7.7	CYAHIDES	220	EXTRACT	27 - 27 - 27 - 27 - 27 - 27 - 27 - 27 -	5
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CHIANIC N 87 - 69	ZINC)	88	OTHER TESTS B		HERULTS
10" AC N 70 - 72		77 - 79	Cond	VCTIVIT,	5e26
73 - 76	ALL HESULTS	EXPRESSED AS MG/L EXCEPT	1 Berzu	vim -	0.00
(17) AL SUBPLY 1 (p. 0)	PHYSICAL OBS	ERVATIONS & COMMENTS (AD	HOHMAL COLOR, C	DOR, FLOATING MATT	IER, OIL,
77 - 60	SCOUGE, TORE	DIDITY, WEATHER!, LOCATION	OF SAMPLING POI	NI:	
A = COMETTIC WASTE ONLY					
EM PROUSTRIAL WASTE ONLY  THE MIREC DOMESTIC & INDUSTRIAL WASTE  SHISTRIAM, LAKE, OR RECEIVING WATER QUI					
T TO MINE CHAINAGE OR WASTE		SAMPLE RECRIVED	DA LABORATORY U	ALUNAUT	
SICH BELOW FOR EFFLUENT SAMPLE		DATE NEC'D	12 26	7145	<u> </u>
MANASPORTED BY & MALLIN		DATE ANALYSES CO			
MECEIVEC BY	TIME	DATE RESULTS FOR		SEP. 10, 1985	
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